



RE: Hanford in-trench treatment at Trenches 31 and 34
Skinnarland, Ron (ECY) to: Dave Bartus

01/19/2011 10:38 AM

Thanks for sharing your concerns. I will check with Deborah and we will talk to you.

Ron Skinnarland
Waste Management Section Manager
Nuclear Waste Program
Washington Department of Ecology
Phone: (509) 372-7924
Email: rski461@ecy.wa.gov
FAX: (509) 372-7971

-----Original Message-----

From: Bartus.Dave@epamail.epa.gov [mailto:Bartus.Dave@epamail.epa.gov]
Sent: Wednesday, January 19, 2011 10:11 AM
To: Skinnarland, Ron (ECY)
Subject: Hanford in-trench treatment at Trenches 31 and 34

Ron: As you may recall, I send a message to Deborah Singleton, with a copy to you, on 1/12/2011 with my analysis of proposed "in-trench treatment" of a batch of 60+ drums of high-temperature gas reactor (HTGR) wastes. I followed-up with Deborah a day or so later verbally, indicating EPA did not view the proposed treatment is being in compliance with LDR rules prohibiting placement of prohibited wastes prior to meeting LDR treatment standards.

Given the long history of this issue, and the fact that it appears alive and well (at least within Energy and contractors), I'd like to have a discussion with you of how to resolve these question. I also note in the e-mail exchange shared with me that Energy/contractors feel they have been authorized to conduct this sort of work through revisions to Part A forms. Since use of Part A forms to provide authorization to treat, store and/or dispose of wastes has been identified as far back as 2008 in the Major Issues Summary document discussed with Rick and Jane, I'd like a better understanding of how Ecology is addressing this concern in light of the apparent continued use of this mechanism by Energy/contractors, particularly for a practice that is specifically prohibited by LDR rules.

Thanks

Dave